

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW HAMPSHIRE**

COALITION FOR OPEN DEMOCRACY,  
*et al.*,

*Plaintiffs,*

v.

DAVID M. SCANLAN, in his official capacity  
as New Hampshire Secretary of State, *et al.*,

*Defendants.*

Case No. 1:24-cv-00312-SE-TSM

**JOINT MOTION FOR ENTRY OF A PROTECTIVE ORDER**

NOW COME all parties, by and through their respective counsel, and jointly request that the Court enter the Proposed Protective Order, attached hereto and made a part hereof, and state as follows:

1. On Thursday, June 12, 2025, the Court held a Status Conference regarding compliance with the Court's order directing Defendants to produce a copy of the Statewide Voter Registration System. Among other things, the Court ordered the parties to file a proposed protective order. Status Conf. Tr. 39:11-14 (June 12, 2025). The Court directed the parties to file either a joint motion or competing versions of a proposed protective order on or before Monday, June 16, 2025. *Id.*

2. The parties have reached a mutually acceptable Proposed Protective Order (Exhibit A) and respectfully request that the Court enter the Proposed Order in this case.

**Prayer for Relief**

WHEREFORE, the parties respectfully request that this Honorable Court:

- A. Grant this Motion;
- B. Enter the attached Proposed Protective Order; and

C. Grant such further relief as is just and equitable.

Respectfully submitted,

DEFENDANTS DAVID M. SCANLAN and  
JOHN M. FORMELLA

By their attorney,

JOHN M. FORMELLA  
ATTORNEY GENERAL

Date: June 16, 2025

/s/ Michael P. DeGrandis  
Michael P. DeGrandis, N.H. Bar No. 277332  
Assistant Attorney General  
Matthew T. Broadhead, N.H. Bar No. 19808  
Associate Attorney General  
Catherine A. Denny, N.H. Bar No. 275344  
Assistant Attorney General  
Office of the Attorney General, Civil Bureau  
1 Granite Place South  
Concord, NH 03301  
(603) 271-3650  
michael.p.degrandis@doj.nh.gov  
catherine.a.denny@doj.nh.gov

COALITION FOR OPEN DEMOCRACY,  
LEAGUE OF WOMEN VOTERS OF NEW  
HAMPSHIRE, THE FORWARD  
FOUNDATION, MCKENZIE NYKAMP  
TAYLOR, DECEMBER RUST, STEVEN  
BORNE (as father and next friend of MILES  
BORNE), and RUSSELL MUIRHEAD (as  
father and next friend of ALEXANDER  
MUIRHEAD and LILA MUIRHEAD)

By their attorneys,

Jacob Van Leer\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
915 15th Street NW  
Washington, D.C. 20005  
(202) 715-0815  
jvanleer@aclu.org

/s/ Henry Klementowicz  
Henry Klementowicz, N.H. Bar No. 21177  
Gilles Bissonnette, NH Bar No. 265393  
AMERICAN CIVIL LIBERTIES UNION OF NEW  
HAMPSHIRE FOUNDATION  
18 Low Avenue  
Concord, NH 03301  
(603) 224-5591  
henry@aclu-nh.org

Geoffrey M. Atkins\*  
John T. Montgomery\*  
Desiree M. Pelletier\*  
ROPES & GRAY LLP  
Prudential Tower, 800 Boylston Street  
Boston, MA 02199  
(617) 951-7000  
Geoffrey.Atkins@ropesgray.com  
John.Montgomery@ropesgray.com  
Patrick.Roath@ropesgray.com  
Desiree.Pelletier@ropesgray.com

gilles@aclu-nh.org  
  
Ming Cheung\*  
Sophia Lin Lakin\*  
Clayton Pierce\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad Street  
New York, NY 10004  
(212) 549-2500  
mcheung@aclu.org  
slakin@aclu.org

\* Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties of record through the Court's e-filing system.

/s/ Michael P. DeGrandis  
Michael P. DeGrandis